

AO 91 (Rev. 11/11) Criminal Complaint

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Veronica RAMIREZ-VERDUZCO

Case No.

Case: 2:25-mj-30119  
Assigned To : Unassigned  
Assign. Date : 3/6/2025  
Description: CMP USA V.  
RAMIREZ-VERDUZCO (DJ)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 17, 2025 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:*Code Section*

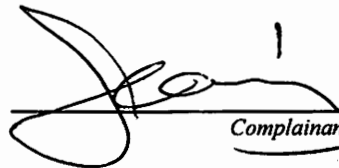
8 U.S.C. 1326(a), (b)(1)

*Offense Description*

Unlawful Re-Entry Following Removal, Prior Felony Conviction

This criminal complaint is based on these facts:

On or about February 17, 2025, in the Eastern District of Michigan, Southern Division, Veronica RAMIREZ-VERDUZCO, an alien from Mexico, who had previously been convicted of a felony offense and was subsequently denied admission, excluded, deported, and removed therefrom on or about April 20, 2013 at or near Eagle Pass, Texas, was found in the United States without having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a), (b)(1).

☐ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: March 6, 2025  
Admission to:City and state: Detroit, MI
  
Complainant's signature

Joseph Camaj, Deportation Officer, ICE Wayne

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

Officer, ICE  
and title

## AFFIDAVIT

I, Joseph Camaj, declare the following under penalty of perjury:

1. I am a Deportation Officer employed with Immigration and Customs Enforcement (ICE) of the United States Department of Homeland Security, having served with ICE as a Deportation Officer since July 2007. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers and record checks of law enforcement databases. I have also reviewed relevant immigration records relating to Veronica RAMIREZ-VERDUZCO, which reveal the following:
2. Veronica RAMIREZ-VERDUZCO is a forty-nine-year-old citizen and a native of Mexico who last entered the United States on an unknown date, at an unknown place, without inspection by the U.S. Department of Homeland Security.
3. On May 5, 2000, RAMIREZ-VERDUZCO applied for admission into the United States from Mexico through the San Ysidro Port of Entry claiming to be a citizen of the United States. Customs & Border Protection (CBP) suspected RAMIREZ-VERDUZCO was not a United States citizen and referred her to Passport Control secondary. During the secondary inspection, an oral interview was conducted, and a sworn statement was taken. RAMIREZ-VERDUZCO admitted to being a citizen and national of Mexico, not possessing the proper documentation to either enter, pass through, or reside in the United States. RAMIREZ-VERDUZCO was served Form I-860, Notice and Order of Expedited Removal pursuant to sections 212(a)(6)(C)(ii) and 212(a)(7)(A)(i)(I) of the INA (Act). RAMIREZ-VERDUZCO was also served Form I-296, Notice to Alien Ordered Removed / Departure Verification, prohibiting her from entering, attempting to enter, or being in the United States for a period of 5 years from her date of departure. RAMIREZ-VERDUZCO was removed from the United States on May 5, 2000, at the San Ysidro, CA Port of Entry.

4. On February 18, 2013, RAMIREZ-VERDUZCO was observed crossing through the Ysleta Cargo lot avoiding inspection by CBP Officers at the Ysleta Port of Entry in El Paso, Texas. A CBP Officer approached RAMIREZ-VERDUZCO, who admitted she did not have identification; she is a Mexican citizen and does not have any entry documents to be present in the United States. RAMIREZ-VERDUZCO stated she was traveling to Michigan to seek employment. RAMIREZ-VERDUZCO was detained and taken to the Ysleta Passport Control secondary where she was identified in IDENT as RAMIREZ VERDUZCO, Veronica (DOB: 11/13/1975) with a prior deport. RAMIREZ-VERDUZCO was in violation of Section 212(a)(7)(A)(i)(I) of the INA and was paroled into the United States pending prosecution proceedings. RAMIREZ-VERDUZCO was detained at the El Paso County Detention Facility. Form I-247 was completed and submitted to ensure her return to Service custody.
5. On February 19, 2013, a criminal complaint was filed against RAMIREZ-VERDUZCO in the United States District Court for the Western District of Texas for unlawful re-entry, in violation of 8 U.S.C. §1326(a).
6. On April 12, 2013, RAMIREZ-VERDUZCO was convicted in the United States District Court for the Western District of Texas, El Paso Division, for the offense illegal re-entry, in violation under Title 8, United States Code, Section 1326. She was sentenced to time served.
7. RAMIREZ-VERDUZCO was removed back to Mexico on April 20, 2013, through the Eagle Pass, Texas Port of Entry.
8. On March 7, 2016, RAMIREZ-VERDUZCO was apprehended at the Otay Mesa Port of Entry (OTM POE) while attempting to unlawfully enter. RAMIREZ-VERDUZCO applied for a 212(d)(4) waiver at the OTM POE and was denied. RAMIREZ-VERDUZCO was processed as Application Withdrawn (AW), Voluntary Return (VR).
9. On February 17, 2025, Immigration and Customs Enforcement/Enforcement and Removal Operations (ICE/ERO) in

Detroit, MI received a biographic hit on RAMIREZ-VERDUZCO via the Alien Criminal Response Information Management System (ACRIME). RAMIREZ-VERDUZCO's biographical information was searched by the Van Buren Twp Department of Public Safety while taking a report from her in which she claimed to be a victim of assault.

10. Further records checks revealed RAMIREZ-VERDUZCO was issued a citation on February 11, 2024, by the Van Buren Twp Department of Public Safety charging "drove while unlicensed or without cycle endorsement" and "improper registered plate."
11. On or about February 17, 2025, ICE Officers reviewed immigration file records and Department of Homeland Security electronic records, which revealed that RAMIREZ-VERDUZCO did not obtain the express consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States.
12. Based on the above information, I believe there is probable cause to conclude that Veronica RAMIREZ-VERDUZCO is a non-citizen who had previously been convicted of a felony offense and was subsequently denied admission, excluded, deported and removed from the United States on or about April 20, 2013, was found in the United States without having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a), (b)(1).

  
Joseph Camaj, Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.

  
Hon. Kimberly G. Altman  
United States Magistrate Judge

March 6, 2025